

October 31, 2014

Director Sara Parker Pauley
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

RE: Comments on the Draft Missouri Nutrient Reduction Strategy

On behalf of the agricultural organizations listed below, I would like to thank you for the opportunity to provide comments on the Missouri Department of Natural Resources' (Department) draft "Missouri Nutrient Loss Reduction Strategy" (Strategy). We all recognize the tremendous effort and the extensive amount of time and stakeholder engagement that the Department invested and sought into the development of this plan. We appreciate those efforts as well as the leadership shown by Department staff, particularly over the last 12 months, forging and following a clear path, together with stakeholders, to accomplish the goal of developing a practical plan tailored to best fit Missouri.

Missouri farmers have repeatedly shown throughout history that they can adapt to challenges and find ways to both increase their production and make substantial improvements to the environment. That commitment to environmental stewardship continues strong today. With that principle in mind, the agriculture groups listed below deliberately invested considerable time and resources to assist and support the department in this Strategy development effort.

For production agriculture, this Strategy relies on the voluntary adoption of proven nutrient stewardship practices on agricultural farmland. We believe these types of material improvements on the land will steadily improve and maintain water quality and presents the best short term and long term approach for Missouri in reducing nutrient loss in downstream waters. To that end, the organizations listed below support these efforts and will work with the Department, along with other cooperating state and federal agencies, to help implement and achieve these goals.

One area of the plan that we believe deserves additional attention is the source of legacy nutrients, particularly phosphorus, from stream bank erosion and from the Corps of Engineers (COE) habitat improvement projects on the Missouri River. The Strategy only briefly mentions the COE Missouri River habitat projects and understates its contribution. The Strategy, referring to a recent COE study, presents the amount of phosphorus contributed to the Gulf from these projects on a percentage basis over a long period of years, both past and future. This characterization does not fairly portray the amount of phosphorus discharged by these projects. The Strategy should more clearly and specifically state that these projects are the single biggest point-source contributor of phosphorus to the Missouri River system and to the Gulf of Mexico. In addition, the Strategy should point out the clear and present incompatibility

of the phosphorus loads from the COE projects with the overarching objective of the Strategy. It should be noted that even the National Academy of Sciences (NAS) study stated that *"...the Corps of Engineers Missouri River restoration projects, and any additional future projects, deliver additional nutrients to the river and Gulf at a time that federal and state agencies, and a variety of nongovernmental organizations, are seeking ways to reduce nutrient loadings across the Mississippi River basin"* (page 115).

Missouri farmers and agribusinesses care about our natural resources and want to protect them for future generations. While not perfect, we believe this strategy will keep us at the forefront of that goal using voluntary, cost-effective and science-based practices and actions to steadily improve water quality over time and across the state. We stand firm that state policies, actions and resources directed towards addressing nutrients and reducing nutrient pollution are best focused on voluntary based efforts, like this strategy, and not on regulatory schemes and additional regulatory burdens. Past successes have shown the path to continued water quality improvements are found in cost-effective tools known to work, such as targeted voluntary conservation measures, in conjunction with continued research, development and demonstration of new approaches. We are pleased to see this strategy take these very principles to heart.

Thank you for considering these comments. We look forward to continued collaborative efforts on nutrient reduction and look forward to working with the Department to further develop and implement this strategy.

Sincerely,



Darrick Steen, P.E.
Environmental Engineer

Submitted on behalf of the following organizations:

- Missouri Corn Growers Association
- Missouri Soybean Association
- Missouri Farm Bureau
- Missouri Pork Association
- Missouri Cattlemen's Association
- The Poultry Federation
- Missouri Agribusiness Association
- Missouri Egg Council
- MFA, Inc.